

BILAL A. ESSAYLI
Acting United States Attorney
JOSEPH T. MCNALLY
Assistant United States Attorney
Acting Chief, Criminal Division
J. MARK CHILDS (Cal. Bar No. 162684)
Assistant United States Attorney
Chief, Transnational Organized Crime Section
JEREMY K. BEECHER (Cal. Bar No. 301272)
MATT COE-ODESS (Cal. Bar No. 313082)
Assistant United States Attorneys
Transnational Organized Crime Section
1400 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: 213-894-2433/5429/8957
Facsimile: 213-894-0142
E-mail: mark.childs@usdoj.gov
jeremy.beecher@usdoj.gov
matt.coe@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDGAR JOEL MARTINEZ-REYES, ET
AL.,

Defendants.

Case No. 2:23-CR-00524 (A) -DMG

STIPULATION REGARDING REQUEST FOR
(1) CONTINUANCE OF TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

CURRENT TRIAL DATE: 10/21/25
PROPOSED TRIAL DATE: 6/2/26

Plaintiff United States of America, by and through its counsel
of record, the Acting United States Attorney for the Central District
of California and Assistant United States Attorneys J. Mark Childs,
Jeremy K. Beecher, and Matt Coe-Odess, and defendants Edgar Joel
Martinez-Reyes, Sai Zhang, Chengwu He, Bernardo Mauberis, Raul
Contreras, Xiaolei Ye, Julio Alexander Cabrera, and Vidal Licon-

1 Robles, both individually and by and through their counsel of record,
2 hereby stipulate as follows:

3 1. The First Superseding Indictment in this case in this case
4 was made public on April 4, 2024.

5 2. On August 7, 2024, the Court set a trial date of October
6 21, 2025, and a pretrial conference date of October 8, 2025.

7 3. All stipulating defendants are released on bond pending
8 trial.

9 4. The status of defendants who are not parties to this
10 stipulation and have not yet entered guilty pleas¹ is as follows:

11 a. Victor Rodriguez-Trujillo was released on bond with
12 electronic monitoring, but subsequently cut off his electronic
13 monitoring devices and absconded from pretrial supervision. He is
14 now a fugitive whose whereabouts are unknown.

15 b. Daniel Gonzalez is a fugitive who is believed to be
16 residing in Northern California.

17 c. Jiaxuan He is a fugitive who is believed to be
18 residing in China.

19 d. Peji Tong is a fugitive who is believed to be in the
20 custody of Chinese authorities.

21 e. Guillermo Zambrano was released on bond with
22 electronic monitoring. Zambrano was taken into custody by United
23 States Immigration and Customs Enforcement ("ICE") in June 2025, was
24 placed into removal proceedings, and is in ICE custody in Adelanto,
25
26

27 ¹ Diego Acosta Ovalle and Panyu Zhao have signed plea
28 agreements filed with the Court, but their change of plea hearings
have not yet occurred.

1 California, pending the outcome of his removal proceeding. Zambrano,
2 through counsel, objects to a continuance of his trial date.

3 f. Jose Pardo is applying for CASA and the parties will
4 separately submit a stipulation to continue his trial date on that
5 basis.

6 5. The parties estimate that the trial in this matter will
7 last approximately two weeks. All defendants are joined for trial
8 and a severance has not been granted.

9 6. By this stipulation, defendants move to continue the trial
10 date to June 2, 2026, and the pretrial conference to May 20, 2026.

11 7. Defendants request the continuance based upon the following
12 facts, which the parties believe demonstrate good cause to support
13 the appropriate findings under the Speedy Trial Act:

14 a. Counsel for defendants represent that they have
15 various prior obligations and trial conflicts. Counsel for
16 defendants also represent that additional time is necessary to confer
17 with their defendants, conduct and complete an independent
18 investigation of the case, conduct and complete additional legal
19 research including for potential pre-trial motions, review the
20 discovery and potential evidence in the case, and prepare for trial
21 in the event that a pretrial resolution does not occur.

22 b. Due to the nature of the prosecution, the number of
23 defendants, the charges in the indictment and the voluminous
24 discovery produced to defendants, this case is so unusual and so
25 complex that it is unreasonable to expect adequate preparation for
26 pretrial proceedings or for the trial itself within the Speedy Trial
27 Act time limits.

1 c. Defense counsel represent that failure to grant the
2 continuance would deny them reasonable time necessary for effective
3 preparation, taking into account the exercise of due diligence.

4 d. Defendants believe that failure to grant the
5 continuance will deny them continuity of counsel and adequate
6 representation.

7 e. The government does not object to the continuance.

8 f. The requested continuance is not based on congestion
9 of the Court's calendar, lack of diligent preparation on the part of
10 the attorney for the government or the defense, or failure on the
11 part of the attorney for the Government to obtain available
12 witnesses.

13 8. For purposes of computing the date under the Speedy Trial
14 Act by which defendant's trial must commence, the parties agree that
15 the time period of October 21, 2025, to June 2, 2026, inclusive,
16 should be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A),
17 (h)(7)(B)(i), (h)(7)(B)(ii), and (h)(7)(B)(iv) because the delay
18 results from a continuance granted by the Court at defendant's
19 request, without government objection, on the basis of the Court's
20 finding that: (i) the ends of justice served by the continuance
21 outweigh the best interest of the public and defendant in a speedy
22 trial; (ii) failure to grant the continuance would be likely to make
23 a continuation of the proceeding impossible, or result in a
24 miscarriage of justice; (iii) the case is so unusual and so complex,
25 due to the nature of the prosecution and number of defendants, that
26 it is unreasonable to expect preparation for pre-trial proceedings or
27 for the trial itself within the time limits established by the Speedy
28 Trial Act; and (iv) failure to grant the continuance would

1 unreasonably deny defendant continuity of counsel and would deny
2 defense counsel the reasonable time necessary for effective
3 preparation, taking into account the exercise of due diligence.

4 9. Zambrano objects to continuing the trial in this matter.
5 Nonetheless, the stipulating parties agree that, pursuant to 18
6 U.S.C. § 3161(h)(6), the time period of October 21, 2025, to June 2,
7 2026, constitutes a reasonable period of delay for Zambrano, who is
8 joined for trial with codefendants as to whom the time for trial has
9 not run and no motion for severance has been granted.

10 10. Nothing in this stipulation shall preclude a finding that
11 other provisions of the Speedy Trial Act dictate that additional time
12 periods be excluded from the period within which trial must commence.
13 Moreover, the same provisions and/or other provisions of the Speedy
14 Trial Act may in the future authorize the exclusion of additional
15 time periods from the period within which trial must commence.

16 IT IS SO STIPULATED.

17 Dated: October 1, 2025

Respectfully submitted,

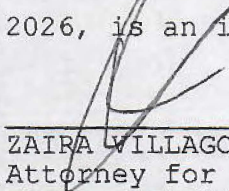
18 BILAL A. ESSAYLI
19 Acting United States Attorney

20 JOSEPH T. MCNALLY
21 Assistant United States Attorney
Acting Chief, Criminal Division

22 /s/
23 J. MARK CHILDS
24 JEREMY K. BEECHER
MATT COE-ODESS
Assistant United States Attorneys

25 Attorneys for Plaintiff
26 UNITED STATES OF AMERICA
27
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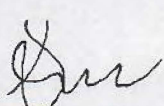
1 I am EDGAR JOEL MARTINEZ-REYES'S attorney. I have carefully
2 discussed every part of this stipulation and the continuance of the
3 trial date with my client. I have fully informed my client of his
4 Speedy Trial rights. To my knowledge, my client understands those
5 rights and agrees to waive them. I believe that my client's decision
6 to give up the right to be brought to trial earlier than June 2,
7 2026, is an informed and voluntary one.

8
9 _____
10 ZAIRA VILLAGOMEZ
Attorney for Defendant
EDGAR JOEL MARTINEZ-REYES

7/26/25

Date

11 This agreement has been read to me in Spanish, the language I
12 understand best, and I have carefully discussed every part of it with
13 my attorney. I understand my Speedy Trial rights. I voluntarily
14 agree to the continuance of the trial date, and give up my right to
15 be brought to trial earlier than June 2, 2026. I understand that I
16 will be ordered to appear in Courtroom 8C of the Federal Courthouse,
17 350 W. 1st Street, Los Angeles, California on June 2, 2026, at 8:30
18 a.m.

19 _____
20 EDGAR JOEL MARTINEZ-REYES
21 Defendant

09/26/2025

Date

22 **CERTIFICATION OF INTERPRETER**

23 I, Z. Villagomez, am fluent in the written and spoken English and
24 Spanish languages. I accurately translated this entire agreement
25 from English into Spanish to defendant EDGAR JOEL MARTINEZ-REYES on
26 this date.

27 _____
28 INTERPRETER

7-26-25

Date

I am SAI ZHANG'S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.



REUVEN L. COHEN
ATOSSA ESMAILI
Attorney for Defendant
SAI ZHNAG

9/15/2025

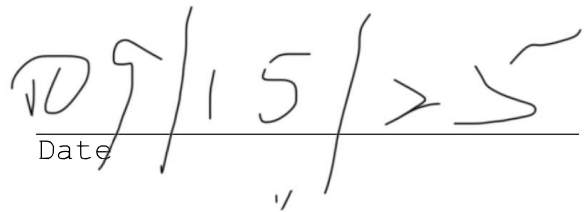
Date

This agreement has been read to me in Mandarin, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026, at 8:30 a.m.



SAI ZHANG
Defendant

Date



CERTIFICATION OF INTERPRETER

I, Yongjia Johnston, am fluent in the written and spoken English and Mandarin languages. I accurately translated this entire agreement from English into Mandarin to defendant SAI ZHANG on this date.



INTERPRETER

9/15/2025

Date

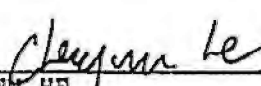
1 I am CHENGWU HE'S attorney. I have carefully discussed every
2 part of this stipulation and the continuance of the trial date with
3 my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than June 2, 2026, is an
7 informed and voluntary one.

8 

9 VICTOR SHERMAN
10 Attorney for Defendant
CHENGWU HE

10/1/2025
Date

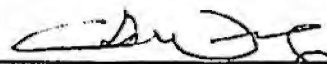
11
12 This agreement has been read to me in Mandarin, the language I
13 understand best, and I have carefully discussed every part of it with
14 my attorney. I understand my Speedy Trial rights. I voluntarily
15 agree to the continuance of the trial date, and give up my right to
16 be brought to trial earlier than June 2, 2026. I understand that I
17 will be ordered to appear in Courtroom 8C of the Federal Courthouse,
18 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30
19 a.m.

20 
21 CHENGWU HE
Defendant

10.1.2025
Date

22 CERTIFICATION OF INTERPRETER

23 I, CHADWANG, am fluent in the written and spoken English and
24 Mandarin languages. I accurately translated this entire agreement
25 from English into Mandarin to defendant CHENGWU HE on this date.

26 
27 INTERPRETER CHAD WANG

10/01/2025
Date

I am BERNARDO MAUBERIS'S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.

Robert M. Helfend

9/21/2025

ROBERT M. HELFEND
Attorney for Defendant
BERNARDO MAUBERIS

Date

This agreement has been read to me in Spanish, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30 a.m.

Bernardo Mauberis

9/24/2025

BERNARDO MAUBERIS
Defendant

Date

CERTIFICATION OF INTERPRETER

I, _____, am fluent in the written and spoken English and Spanish languages. I accurately translated this entire agreement from English into Spanish to defendant BERNARDO MAUBERIS on this date.

Bernardo Mauberis

9/24/2025

INTERPRETER

Date

I am RAUL CONTRERAS'S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.



CHARLES BROWN
Attorney for Defendant
RAUL CONTRERAS

9-26-25
Date

This agreement has been read to me in Spanish, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30 a.m.



RAUL CONTRERAS
Defendant

9-26-25
Date

CERTIFICATION OF INTERPRETER

I, _____, am fluent in the written and spoken English and Spanish languages. I accurately translated this entire agreement from English into Spanish to defendant RAUL CONTRERAS on this date.

INTERPRETER

Date

I am XIAOLEI YE'S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.

Edward Robinson
EDWARD M. ROBINSON
Attorneys for Defendant
XIAOLEI YE

Sept. 12, 2025
Date

This agreement has been read to me in Mandarin, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30 a.m.

XIAOLEI YE
Defendant

09/12/2025
Date

CERTIFICATION OF INTERPRETER

I, _____, am fluent in the written and spoken English and Mandarin languages. I accurately translated this entire agreement from English into Mandarin to defendant XIAOLEI YE on this date.

INTERPRETER

Date

I am JULIO ALEXANDER CABRERA'S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.

<p>DocuSigned by:  245F9361A801456...</p>	<p>9/18/2025</p>
<p>PETER JOHNSON Attorney for Defendant JULIO ALEXANDER CABRERA</p>	<p>Date</p>

This agreement has been read to me in Spanish, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30 a.m.

<p>DocuSigned by:  9FF202D1B475477</p>	<p>9/16/2025</p>
<p>JULIO ALEXANDER CABRERA Defendant</p>	<p>Date</p>

CERTIFICATION OF INTERPRETER

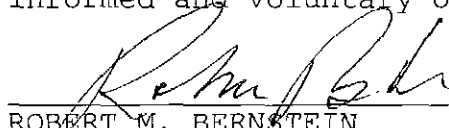
I, _____, am fluent in the written and spoken English and Spanish languages. I accurately translated this entire agreement from English into Spanish to defendant JULIO ALEXANDER CABRERA on this date.

<p>INTERPRETER</p>	<p>Date</p>
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I am VIDAL LICON-ROBLES'S attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than June 2, 2026, is an informed and voluntary one.


ROBERT M. BERNSTEIN
Attorney for Defendant
VIDAL LICON-ROBLES

9/15/25
Date

~~This agreement has been read to me in Spanish, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than June 2, 2026. I understand that I will be ordered to appear in Courtroom 8C of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on June 2, 2026 at 8:30 a.m.~~


VIDAL LICON-ROBLES
Defendant

9/15/25
Date

CERTIFICATION OF INTERPRETER

I, _____, am fluent in the written and spoken English and Spanish languages. I accurately translated this entire agreement from English into Spanish to defendant VIDAL LICON-ROBLES on this date.

INTERPRETER

Date